

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
SPARTANBURG DIVISION

HANNAH ROBERTSON, INDIVIDUALLY AND ON BEHALF OF
HER MINOR CHILD, R.R.S.

Case No:

Plaintiffs,

vs.

ANDERSON MILL ELEMENTARY SCHOOL, SPARTANBURG
COUNTY SCHOOL DISTRICT #6 AND ELIZABETH FOSTER,
INDIVIDUALLY AND IN HER OFFICIAL CAPACITY AS
PRINCIPAL

Defendants.

**PLAINTIFFS' ANSWERS TO LOCAL CIVIL RULE 26.01
INTERROGATORIES**

Plaintiffs Hannah Robertson and her minor child R.R.S., by and through their undersigned attorneys, hereby answer Local Civil Rule 26.01 Interrogatories as follows:

(A) State the full name, address, and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

ANSWER: **None aware of.**

(B) As to each claim, state whether it should be tried jury or non jury and why.

ANSWER: **All claims should be tried by jury as it is Plaintiffs' right.**

(C) State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

ANSWER: **Neither Plaintiff is a publicly owned company.**

(D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division). *See* Local Civil Rule 3.01.

ANSWER: **The Spartanburg division is the division where a substantial part of the events or omissions giving rise to the claim occurred.**

(E) Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how

the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which *may be* related regardless of whether they are still pending. Whether cases *are* related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions, happenings, or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

ANSWER: **No.**

(F) [*Defendants only.*] If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

ANSWER: **N/A.**

(G) [*Defendants only.*] If you consent that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of said liability.

ANSWER: **N/A.**

Respectfully submitted,

s/Eric C. Poston

Eric C. Poston [Fed Bar #12436]
Chalmers Poston, LLC
1320 Main Street, Suite 300
Columbia, SC 29201
(803) 463-4561
eposton@chalmersposton.com
ATTORNEYS FOR PLAINTIFFS

March 6, 2019